

EXHIBIT C

Darcie Brault

From: Rogaczewski, Joshua <jrogaczewski@mwe.com>
Sent: Monday, January 06, 2014 2:20 PM
To: Darcie Brault
Cc: Burchfield, Bobby; Capotosto, Laura; Norman C. Ankers (Honigman) (NAnkers@honigman.com)
Subject: RE: Reese v. CNH Global N.V., Case 2:04-cv-70592-PJD-PJK (E.D. Mich.): Stahl Docs.

Darcie:

We have produced documents during this remand consistent with how we have produced documents in numerous other civil cases, including the multiple productions that occurred in the earlier part of this case, which were much larger and more diverse than any of the productions made during the remand. Plaintiffs' complaints about CNH's form of production are baseless.

As for CNH Industrial N.V., after Plaintiffs rejected the substitution of CNH Industrial N.V. for the no-longer-existing CNH Global N.V., the company reconsidered the matter and determined that substitution of CNH Industrial for CNH Global is not appropriate. Plaintiffs resolved their claims against CNH Global years ago in exchange for a guaranty by CNH Global of whatever liability CNH America LLC was determined to have to Plaintiffs. Accordingly, there are no claims pending against CNH Global and no need to substitute CNH Industrial for CNH Global. Indeed, the Court's docket indicates that CNH Global is a "terminated" party. The appropriate path forward is a guaranty by CNH Industrial.

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